

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Roanoke Division**

KIMBERLY BROWN,)	
)	
Plaintiff,)	
)	
v.)	
)	
NEW ENGLAND COMPOUNDING)	
PHARMACY, INC. d/b/a)	
NEW ENGLAND)	
COMPOUNDING CENTER,)	Civil Action No. 7:12-cv-584-SGW
)	
and)	
)	
IMAGE GUIDED PAIN)	
MANAGEMENT, P.C. d/b/a)	
INSIGHT IMAGING ROANOKE,)	
)	
Defendants.)	

**IMAGE GUIDED PAIN MANAGEMENT, P.C.'S
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

COMES NOW Defendant Image Guided Pain Management, P.C. d/b/a Insight Imaging Roanoke ("IGPM"),¹ by counsel, and moves the Court to dismiss Plaintiff's Complaint, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, for the reasons set forth in its Memorandum of Law filed contemporaneously herewith.

¹ At all times relevant hereto, IGPM was a Virginia professional corporation consisting of two physician shareholders who practiced medicine at 2923 Franklin Road Southwest, Roanoke, VA 24014. The name of the clinic where IGPM's physicians practiced was Insight Imaging—Roanoke. IGPM neither owns nor manages such clinic. Instead, that clinic is owned and managed by InSight Health Corporation ("Insight"). Insight is a Delaware corporation with offices across the United States and its principal place of business in Minneapolis, Minnesota.

Respectfully submitted,

IMAGE GUIDED PAIN
MANAGEMENT, P.C.

By: s/ Michael P. Gardner

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CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to the following:

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